# STATE OF NEW MEXICO DEPARTMENT OF ENERGY, MINERALS AND NATURAL RESOURCES OIL CONSERVATION DIVISION

APPLICATION OF NOVO OIL & GAS NORTHERN DELAWARE, LLC TO EXTEND TIME TO COMMENCE DRILLING OPERATIONS, EDDY COUNTY, NEW MEXICO.

**CASE NO. 24339 ORDER NO. R-22622** 

# PRE-HEARING STATEMENT

Novo Oil & Gas Northern Delaware, LLC ("Novo" or "Applicant") submits its Pre-Hearing Statement pursuant to the rules of the Oil Conservation Division.

APPLICANT ATTORNEYS

Novo Oil & Gas Northern Dana S. Hardy Delaware, LLC Jaclyn McLean

Hinkle Shanor LLP P.O. Box 2068

Santa Fe, NM 87504-2068 Phone: (505) 982-4554 dhardy@hinklelawfirm.com jmclean@hinklelawfirm.com

INTERESTED PARTY ATTORNEYS

EOG Resources, Inc. Jordan L. Kessler

EOG Resources, Inc.

125 Lincoln Ave., Suite 213

Santa Fe, NM 87501 Phone: (432)488-6108

Jordan\_kessler@eogresources.com

### STATEMENT OF THE CASE

Applicant applies for an order extending the time to commence drilling the Tickety Boo Fed Com 2109 121H, Tickety Boo Fed Com 2109 122H, Tickety Boo Fed Com 2109 123H, Tickety Boo Fed Com 2109 131H, Tickety Boo Fed Com 2109 132H, and Tickety Boo Fed Com 2109 133H wells ("Wells"). The Division issued Order No. R-22622 ("Order") in Case No. 23210

on April 13, 2023, approving a 720-acre, more or less, standard horizontal spacing unit comprised of the W/2 of Sections 9 and 16, and the N/2 NW/4 of Section 21, Township 19 South, Range 30 East, Eddy County, New Mexico ("Unit"); dedicated the Unit to the Wells; and designated Applicant as operator of the Unit and Wells. The Order provides that it shall terminate if Novo fails to commence drilling the Wells by April 13, 2024, unless good cause is shown.

Good cause for an extension exists because Novo's overall development plans in the immediate area of the Wells would be best served by co-developing the Wells with adjacent lands to prevent waste (i.e. parent-child effects), and federal drilling permits for wells in the adjacent tracts have been delayed. These delays have impacted Novo's ability to commence drilling the Wells. Novo requests that the Division extend the deadline to commence drilling the Wells until April 13, 2025.

# PROPOSED EVIDENCE

Witness	Occupation	<b>Estimated Time</b>	<b>Exhibits</b>
Mason Maxwell	Landman	Affidavit	Approx. 2

### PROCEDURAL MATTERS

Applicant will present this matter by affidavit if there is no opposition.

Respectfully submitted,

HINKLE SHANOR, LLP

/s/ Dana S. Hardy

Dana S. Hardy

Jaclyn McLean

P.O. Box 2068

Santa Fe, NM 87504-2068

Phone: (505) 982-4554

Facsimile: (505) 982-8623

dhardy@hinklelawfirm.com

jmclean@hinklelawfirm.com

Counsel for Novo Oil & Gas Northern Delaware.

LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on March 28, 2024, I served a true and correct copy of the foregoing pleading on the following counsel of record by electronic mail:

Jordan L. Kessler EOG Resources, Inc. 125 Lincoln Ave., Suite 213 Santa Fe, NM 87501 Jordan\_kessler@eogresources.com

/s/ Dana S. Hardy
Dana S. Hardy

District I
1625 N. French Dr., Hobbs, NM 88240
Phone: (575) 393-6161 Fax: (575) 393-0720

District II 811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III 1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone:(505) 476-3470 Fax:(505) 476-3462

**State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division** 1220 S. St Francis Dr. **Santa Fe, NM 87505** 

QUESTIONS

Action 327658

### **QUESTIONS**

Operator:	OGRID:
Permian Resources Operating, LLC	372165
300 N. Marienfeld St Ste 1000	Action Number:
Midland, TX 79701	327658
	Action Type:
	[HEAR] Prehearing Statement (PREHEARING)

#### QUESTIONS

Testimony		
Please assist us by provide the following information about your testimony.		
Number of witnesses	Not answered.	
Testimony time (in minutes)	Not answered.	